

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

AUTUMN LAMPKINS,)	
)	
Plaintiff,)	
)	C.A. No. 1:16-cv-00647-CFC
v.)	
)	JURY TRIAL DEMANDED
MITRA QSR KNE, LLC,)	
)	
Defendant.)	
_____)	

**JOINT STIPULATION AND [PROPOSED] ORDER
REGARDING TIMING FOR FILING CERTAIN POST-TRIAL MOTIONS**

WHEREAS, this employment discrimination action was tried before a jury from February 4, 2019, through February 8, 2019;

WHEREAS, the jury returned an initial verdict on the issue of liability in favor of the Plaintiff on all counts on February 8, 2019;

WHEREAS, the jury returned a verdict on damages in favor of the Plaintiff, awarding her \$25,000 in compensatory damages and \$1,500,000 in punitive damages on February 8, 2019;

WHEREAS, the Court and the Parties, at the conclusion of trial, contemplated and discussed filing a Stipulation regarding the timing for filing of certain post-trial motions;

WHEREAS, the Parties have reached an agreement regarding the timing for filing certain post-trial motions and have reduced that agreement to writing;

WHEREAS, the Parties wish to have this agreement entered as an Order of the Court;

WHEREFORE, the Parties hereby stipulate and agree and the Court Orders as follows:

1. Notwithstanding any statute, regulation, or rule to the contrary, Plaintiff shall have until 6:00 p.m. on March 29, 2019, to file a motion for back pay and pre-judgment interest. Defendant's Response shall be filed within 14 days pursuant to the Court's Local Rules;

2. Notwithstanding any statute, regulation, or rule to the contrary, the prevailing party shall have 14 days from the Court's ruling on the last of the post-trial motion and/or motion for back pay and pre-judgment interest to submit any motion for costs and attorneys' fees. Any Response shall be filed with 14 days pursuant to the Court's Local Rules. This Court shall retain jurisdiction to determine costs and attorney's fees following any appeal.

JACOBS & CRUMLAR, P.A.

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IT IS SO ORDERED this 25th day of February, 2019



HONORABLE COLM F. CONNOLLY
United States District Judge